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GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
LANSING



DAN WYANT  
DIRECTOR

February 25, 2015

Dr. Susan Hedman, Regional Administrator  
U.S. Environmental Protection Agency  
Region 5  
77 West Jackson Boulevard (R-19J)  
Chicago, Illinois 60604-3590

Dear Dr. Hedman:

SUBJECT: Request/Approval for an Extension Agreement, Revised Total Coliform Rule

The Michigan Department of Environmental Quality (MDEQ) is requesting an extension to the date that final primacy revisions are due to the U.S. Environmental Protection Agency (U.S. EPA) for the Revised Total Coliform Rule (RTCR) until February 13, 2017, as allowed by Title 40 of the Code of Federal Regulations (CFR), Section 142.12, Revision of State Programs, and would appreciate your approval. Staff of the MDEQ have conferred with your staff and have agreed to the requirements listed below for this extension. This extension is being requested because the MDEQ is planning to group two or more program revisions into a single legislative or regulatory action.

In order to help the U.S. EPA track the progress of the MDEQ's promulgation of the RTCR, we are informing you that the RTCR is moving through the rulemaking process under the Michigan Department of Licensing and Regulatory Affairs, Office of Regulatory Reinvention No. ORR 2014-023 EQ. We anticipate the rules will be promulgated before the end of 2015.

The MDEQ will be working with the U.S. EPA to implement the RTCR within the scope of its current authority and capability, as outlined in the areas identified in 40 CFR, Section 142.12(b)(3)(i) to (v):

- i) Informing public water supplies (PWSs) of the new U.S. EPA (and upcoming state) requirements and the fact that the U.S. EPA will be overseeing implementation of the requirements until the U.S. EPA approves the state revision.

MDEQ	U.S. EPA	
	X	Provide copies of regulation and guidance to other state agencies, PWSs, technical assistance providers, associations, or other interested parties.
	X	Educate and coordinate with MDEQ staff, PWSs, the public, and other water associations about the requirements of this regulation.
X		Notify affected systems of their requirements under the RTCR.

- ii) Collecting, storing, and managing laboratory results; public notices; and other compliance and operation data required by the U.S. EPA regulations.

MDEQ	U.S. EPA	
See enclosure, Section 1		Devise a tracking system for PWS reporting pursuant to the RTCR.
See enclosure, Section 1		Keep PWSs informed of reporting requirements during development and implementation.
See enclosure, Section 1		Report RTCR violations and enforcement information to Safe Drinking Water Information System (SDWIS) as required.

- iii) Assisting the U.S. EPA in development of the technical aspects of enforcement actions and conducting informal follow up on violations (telephone calls, letters, etc.).

MDEQ	U.S. EPA	
X		Issue notices of violation for treatment technique, maximum contaminant level (MCL), and monitoring/reporting violations of the RTCR.
X		Provide immediate technical assistance to PWSs with treatment technique, MCL, and/or monitoring/reporting violations to try to bring them into compliance.
See enclosure, Section 1, under Additional Action Items		Refer all violations to the U.S. EPA for enforcement if they have not been resolved within 60 days of the incident that triggered the violation. Provide information as requested to conduct and complete any enforcement action referred to the U.S. EPA.

- iv) Providing technical assistance to PWSs.

MDEQ	U.S. EPA	
X		Conduct training within the state for PWSs on RTCR rule requirements.
X		Provide technical assistance through written and/or verbal correspondence with PWSs.
X		Provide on-site technical assistance to PWSs as requested and needed to ensure compliance with this regulation.
X		Coordinate with other technical assistance providers and organizations to provide accurate information and aid in a timely manner.

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- v) Providing the U.S. EPA with all information prescribed by the State Reporting Requirements in 40 CFR, Section 142.15.

MDEQ	U.S. EPA	
See enclosure, Section 1		Report any violations incurred by PWSs for this regulation each quarter.
See enclosure, Section 1		Report any enforcement actions taken against PWSs for this regulation each quarter.
See enclosure, Section 2		Report a list of systems that the MDEQ is allowing to monitor less frequently than once per month for community water supplies or less frequently than once per quarter for noncommunity water supplies, including applicable date of the reduced monitoring requirement for each system.

In addition, please see the enclosed Revised Total Coliform Rule Workload/Work Share Responsibilities Checklist for a full list of all RTCR implementation activities.

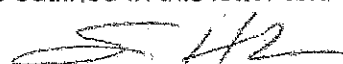
I affirm that the MDEQ will implement provisions of the RTCR as outlined in this letter and in the associated enclosure. Enclosed is a second original of this Extension Agreement. Upon your signature, please return one original to the MDEQ.

Should you require further information, please contact Ms. Liane J. Shekter Smith, P.E., Chief, Office of Drinking Water and Municipal Assistance, at 517-284-6543; shekterl@michigan.gov; or MDEQ, P.O. Box 30241, Lansing, Michigan 48909-7741; or you may contact me at 517-284-6700.

  
Dan Wyant, Director  
Michigan Department of Environmental Quality

2.24.15  
Date

I have consulted with my staff and approve your extension for the aforementioned regulation. I affirm that the U.S. EPA, Region 5, will implement provisions of the RTCR as outlined in this letter and the associated enclosure.

  
Susan Hedman, Regional Administrator  
U.S. Environmental Protection Agency, Region 5

3-24-2015  
Date

This Extension Agreement will take effect upon the date of the last signature and will remain in effect until February 13, 2017.

Enclosures

cc: Mr. Jim Sygo, Deputy Director, MDEQ  
Ms. Liane J. Shekter Smith, MDEQ  
Ms. Jean Shekter, MDEQ

**Michigan Department of Environmental Quality  
Revised Total Coliform Rule  
Workload/Work Share Responsibilities Checklist**

1. State primacy revision planning activities.
2. Monitoring requirements.
3. Sample siting plans.
4. Seasonal systems.
5. Notifications and procedures.
6. Assessments and corrective actions.
7. Technical assistance and training plans.
8. Data management and recordkeeping.

MDEQ Comment:

List of Acronyms

40.CFR: Title 40 of the Code of Federal Regulations  
CCR: Consumer Confidence Report  
CWS: Community Water Supply  
EPA: U.S. Environmental Protection Agency  
LHD: Local Health Department  
LSB: Legislative Service Bureau  
MDEQ: Michigan Department of Environmental Quality  
NCWS: Noncommunity Water Supply  
OIC: Operator in Responsible Charge  
ORR: Office of Regulatory Reinvention  
PWS Program Staff: Public water supply program staff, which is MDEQ district staff for CWSs and LHD staff for NCWSs.  
Region: U.S. EPA, Region 5  
RTCR: Revised Total Coliform Rule  
SDWIS: Safe Drinking Water Information System  
TC: Total Coliform  
TCR: Total Coliform Rule  
TNCWS: Transient Noncommunity Water Supply

**1. State Primacy Revision Planning Activities**

Pursuant to 40 CFR, Section 142.12, complete and final requests for approval of program revisions to adopt new or revised EPA regulations must be submitted to the EPA Administrator no later than two years after promulgation of new or revised federal regulations (or by February 13, 2015, for the RTCR). A state may be granted an extension of up to two years to submit its application package. To facilitate the primacy revision process, the following activities have been identified:

MDEQ Comment: The following is the anticipated time line to submit the primacy application:

02/24/2014	Submitted request for rulemaking.
03/03/2014	Received approval to begin rulemaking process.

05/29/2014	Held stakeholder meeting.
06/27/2014	Held stakeholder meeting.
Ongoing	Meeting with LHDs and NCWSs to discuss impact of the RTCR.
10/21/2014	Submitted draft rules to the ORR for informal content approval.
10/29/2014	ORR informally approved rules and forwarded to the LSB for informal format approval.
12/04/2014	Submitted informally approved rules and draft primacy package to the Region.
02/18/2015	Held public hearing. The Region comments on draft rules will become part of the official public hearing record.
Summer 2015	Submit draft rules for Joint Committee on Administrative Rules' action, ORR/LSB formal approval. The Legislature must have an opportunity during 15 session days to review the rules. The Legislature is not in session during the summer.
Dec 2015	Promulgate rules.
Mar 2016	Submit request for Attorney General statement of enforceability.
Jun 2016	Obtain Attorney General statement of enforceability.
02/13/2017	Submit final primacy package.

To follow the rulemaking process, visit [www.michigan.gov/lara](http://www.michigan.gov/lara). Click on Office of Regulatory Reinvention, click on Pending Rule Changes, click on Environmental Quality under the Rules by Department category, scroll to rule revision 2014-023 EQ.

- a. Provide EPA with notification of the state's general process for codification/regulations at least as stringent as the RTCR.
- b. Provide EPA with the anticipated date of state codification/regulations at least as stringent as the RTCR.
- c. Provide anticipated date of draft RTCR primacy application crosswalk or extension request.
- d. Develop schedule for submittal of final primacy application crosswalk.
- e. Develop plan and timeline to address any deficiencies in the crosswalk.
- f. Provide EPA with the anticipated date of submission of complete program revision application.
- g. Provide EPA with the General Overview/Description of primacy agency resource planning procedures and viability for implementation of RTCR.

<p>MDEQ Comment: No funding is currently appropriated to address the additional activities with this rule. However, the MDEQ is weighing options for additional funding for rule implementation. Since the mid-1990s, the MDEQ has contracted with all of Michigan's LHDs to implement the NCWS Program for approximately 9,600 NCWSs. In fiscal year 2014 the LHDs received approximately \$1.8 million through these contracts to perform existing services, which represents approximately 40 percent of the funding necessary to operate the program. It is estimated, on average, an LHD will need to spend 20 hours more per week to handle the increased tasks associated with the RTCR or \$31,000 annually per LHD, totaling \$1.4 million. This equates to \$147 per NCWS per year. The MDEQ's role in the NCWS Program is to oversee these contracts, which includes training and evaluating each LHD's implementation of the NCWS Program to ensure primacy requirements are met.</p>
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- h. Provide EPA with the General Overview/Description of primacy agency laboratory workload planning/assessment of capability for the RTCR implementation.

MDEQ Comment: Draft rules omit provisions for seasonal systems to reduce to annual monitoring. Approximately 2,000 systems may be considered seasonal, and about half of those monitor annually. Over the next two years, we are encouraging PWS Program staff to increase those seasonal systems to quarterly monitoring. Therefore, the PWS Program staff and private laboratories will have two years to gradually absorb any increase in workload.

- i. Provide EPA with the General Overview/Description of primacy agency database management workload planning/assessment of capability for the RTCR implementation.

MDEQ Comment: The CWS Program is implemented in eight district offices and the NCWS Program in 44 LHDs. Inventory and most compliance information is currently maintained in the SDWIS/State for CWSs and a Web database application, WaterTrack, for NCWSs. Compliance that is not tracked in SDWIS/State or WaterTrack is currently tracked in ad hoc tracking mechanisms in the district offices and LHDs. For NCWSs, reporting to the EPA on compliance data usually follows a laborious process of gathering information from each LHD. In summary, determining compliance, tracking compliance, and reporting to the EPA under current rules is not fully automated for either program using SDWIS and WaterTrack. This situation will become more acute as we implement the RTCR.

We strongly believe that during this primacy extension period, the increased public health protection of the RTCR will be realized because our PWS Program staff has for decades followed up, and will continue to follow-up, on TC+ results; will increase oversight scrutiny when TC+ results repeatedly occur (such as twice in a 12-month period); will ensure monitoring frequency is appropriate to demonstrate the water is safe; and will issue violations and require public notice as appropriate. However, until SDWIS Prime is fully capable, useable, and adopted in Michigan, and until our PWS Program staff is trained in SDWIS Prime, we will not be able to track or report to the EPA some elements of the RTCR, especially for NCWSs.

The following are examples of elements we anticipate will be less than fully implemented:

- Identifying and tracking increases and decreases in monitoring requirements – LHD staff currently identify NCWSs for increased or decreased monitoring when the situation dictates, but the need to do this is much less frequent than what is expected under the RTCR.
- Tracking certification of start-up procedure – For decades LHD staff have required pre-opening samples and other start-up procedures for some NCWSs with seasonal characteristics. LHD staff tracked compliance and followed up when necessary using ad hoc tracking mechanisms.
- Tracking triggered events under the RTCR – These events currently trigger scrutiny under existing data systems and long-standing practice in the district offices and in the LHDs. For example, a TC MCL under the TCR translates to a Level 1 assessment, and two TC MCLs under the TCR in a year triggers enhanced scrutiny by PWS Program staff.
- Reporting to the EPA the RTCR violations and enforcement information that did not exist in the TCR – For example, failure to submit the start-up procedure certification is a treatment technique violation. LHD staff will follow up and will issue violations, but has no mechanism to report to either the state or to the EPA.

- j. Follow Figure 7-1 for the State Rule Implementation and Revision Timetable for the RTCR (At-A-Glance Timeline) and Table 7-2 (State Primacy Revision Extension Checklist) in the RTCR State Implementation Guidance.

MDEQ Comment: We will follow, as closely as possible, the timetable in Table 7-1b RTCR Implementation and Revision Timetable for States with Primacy Extension as outlined in the beginning of this work share document.

- k. Establish a process to coordinate and communicate with the EPA about the RTCR implementation activities (as described in more detail below) to provide accurate information and aid in a timely manner.

MDEQ Comment: As is our long-standing relationship with the Region, we will continue to maintain open communication with the Region on implementation activities. The points of contact for RTCR are:

CWS implementation, Pat Cook, [cookp@michigan.gov](mailto:cookp@michigan.gov), 517-284-6514.

NCWS implementation, Carrie Monosmith, [monosmithc@michigan.gov](mailto:monosmithc@michigan.gov), 517-290-2601.

Rule promulgation/primacy process, Jean Shekter, [shekterj@michigan.gov](mailto:shekterj@michigan.gov), 517-284-6519.

#### **Additional Action Items if State Requests an Extension for Primacy**

MDEQ Comment: Before the compliance date of April 1, 2016, we will notify water supplies of their requirements, as we have committed in each year in the Annual Resource Deployment Plan for new rules. As with all things rule-related, the first point of contact for a water supply is the PWS Program staff. All of our compliance communications to water supplies, including notifications about the RTCR, include PWS Program staff contact information.

Until rules are promulgated, we will refer to the Region any actions for which we lack enforcement authority, such as a department order. We will notify the affected water supply of the role of the Region and of the PWS Program staff relative to the enforcement action. During an ongoing enforcement action, we will provide the Region with any information and data existing in the MDEQ or the LHD, as appropriate, that the Region needs to carry out the enforcement action. In the meantime, PWS Program staff will implement the RTCR as outlined in this activities document, unless otherwise stated in the comments.

- State must notify its PWSs of EPA's implementation of the RTCR, including contact information for PWSs at the state (who can answer questions about primacy program deficiencies or lack of regulatory/statutory authority, or timeframes for the state's implementation of the RTCR) and at EPA (for RTCR implementation).
- As part of this notification, the state should provide the respective state and EPA roles and responsibilities to its PWSs related to RTCR. In order to establish roles and responsibilities, the state and EPA should have meetings to discuss the RTCR workload activities mentioned above.
- In the state's notification to the PWSs, it should provide a description of how the state will assist EPA and PWSs for successful implementation of the RTCR.
- In correspondence to EPA, the state should describe which state meetings EPA should attend to provide support and/or testimony of the need for the state to obtain RTCR primacy in order to maintain full primacy for its PWSS program.

## 2. Monitoring Requirements and Primacy Agency Activities

### Identifying Systems on Reduced Monitoring: Quarterly or Annual Monitoring

MDEQ Comment: Our draft rules do not allow reduced monitoring for CWSs. All CWSs have monitored monthly for years and will continue to do so. The MDEQ does not commit to reporting lists of NCWSs that monitor less frequently than quarterly until SDWIS Prime is fully capable, useable, and adopted in Michigan, and until our PWS Program staff is trained in SDWIS Prime. Sample siting plans are available for PWS Program staff review and revision, as per the 1989 Total Coliform Rule and the Groundwater Rule. The Groundwater Rule dual purpose sample provision will end as of March 31, 2016, according to our draft rules. As a result of this change, we will require a revised sample siting plan from supplies whose monitoring requirements change. Otherwise, we will implement as per rule with any adjustments as mentioned below.

a. Update sample siting plans for systems on quarterly/annual monitoring.

- Identify vulnerable or critical month(s) for seasonal system monitoring and have an approved sample siting plan before reducing monitoring for a seasonal system.

MDEQ Comment: We are currently discussing vulnerable or critical months for seasonal supplies.

- Identify special purpose sampling locations (especially if total coliform monitoring is part of start-up procedures or is part of a response to assessment/corrective action for failure to conduct repeat monitoring).

MDEQ Comment: Special purpose sampling locations are not included in all sample siting plans. Michigan rules require water supplies to demonstrate safe water before bringing infrastructure in service by submitting two consecutive nondetect TC results collected 24 hours apart. This procedure will continue for all supplies, including seasonal systems.

- Make a determination on whether the state will use the waiver provision for the three additional routine samples required the month after a routine TC+ (i.e., additional routine monitoring) and GWR triggered source water sampling.

MDEQ Comment: On a case-by-case basis.

- Decide on routine and repeat monitoring sites (restricting or allowing a PWS to choose its own repeat sites).

MDEQ Comment: Our draft rules adopt RTCR provision to allow criteria for selecting repeat locations on a situational basis in a standard operating procedure in the sampling site plan under 40 CFR §141.853(a)(5)(i). We intend to implement this provision only in cases where assigning repeat locations in the sample siting plan is not feasible, such as in a manufactured housing community where the assigned repeat locations are frequently removed with little or no notice.

- Verify that any dual purpose sampling is approved and indicated in the sample siting plan.

MDEQ Comment: Beginning April 1, 2016, dual purpose samples will not be allowed.



- Use information from the special monitoring evaluations to update the sample siting plan. (Note: all ground water systems serving 1,000 or fewer people, regardless of RTCR monitoring frequency, are required to have a special monitoring evaluation to remain on reduced monitoring.)

MDEQ Comment: PWS Program staff evaluates whether the monitoring protocol in the sample siting plan is appropriate during each sanitary survey visit. This practice will continue.

- b. Describe reduced monitoring criteria. The state must develop reduced monitoring criteria if it does not require all PWSs to monitor monthly. PWSs monitoring quarterly or annually can be triggered into monthly monitoring and therefore, the state must specify that it will not allow these PWSs to return to less than monthly monitoring in the primacy crosswalk, or develop the reduced monitoring criteria for returning these systems to less than monthly monitoring. The primacy agency must describe how the criteria will be evaluated to determine when systems qualify for reduced monitoring (mandatory criteria listed below).

MDEQ Comment: CWSs will not reduce from monthly monitoring. Seasonal NCWSs will not reduce from quarterly monitoring. LHD staff will evaluate the criteria for each year-round NCWS that is considered for reduced monitoring. Source of water and population are maintained in WaterTrack. The remainder of the criteria will be evaluated from information and data in the supply's file kept in the LHD overseeing the supply.

- Determine if the system uses surface water, groundwater under the direct influence (GWUDI) or a surface water/GWUDI blended source(s).
- Determine if the system is serving 1,000 or fewer people.
- Determine if the system has a clean compliance history (i.e., 12 rolling months minimum for systems on quarterly monitoring and two consecutive years for systems monitoring annually).
- Determine if the system has a protected source.
- Determine if the system meets approved construction standards.
- Assess whether the system has had an annual site visit/Level 2 assessment/sanitary survey.
- Determine if all sanitary defects have been corrected.
- If on annual monitoring, specify if the state will require one or more additional criteria and how the mandatory criteria will be evaluated.

MDEQ Comment: Michigan does not adopt the CWS reduced monitoring of 40 CFR §141.855(c) to (f) and does not adopt the seasonal NCWS annual reduced monitoring of 40 CFR §141.854(i)(2)(iii). As per 40 CFR §141.854(h)(2) for year-round NCWSs, we will require one or more of the following criteria. However, criteria (iv) and (v) will probably not be used to consider reduced monitoring. Disinfecting and employing treatment to remove or inactivate viruses may be operations that should be monitored more often, not less often. We have not yet decided on equivalent enhancements.

- i. Cross-connection control.
- ii. Certified operator by state certification program.
- iii. Regular site visits by circuit rider certified by an appropriate state certification program (state would need to define "regular").
- iv. Continuous disinfection and maintenance of disinfectant residual throughout distribution system.

- v. Demonstration of 4.0-log virus removal or inactivation.
  - vi. Other equivalent enhancements to water system barriers (state would need to define "equivalent enhancements").
- c. Establish a process for determining whether a CWS initially meets the operator certification requirements, and a process to track whether the system continues to meet those requirements in order to remain on reduced monitoring.

MDEQ Comment: Not applicable under RTCR. CWSs will not reduce from monthly monitoring.

- d. Clarify that a PWS must begin monthly monitoring in the next month once it fails to meet the operator certification requirements.

MDEQ Comment: Under 40 CFR §141.855(d)(i) a CWS that loses a certified operator must return to monthly monitoring. All Michigan CWSs monitor monthly. Michigan is not adopting reduced monitoring provisions for CWSs.

- e. Determine how the state should be notified when there are any changes in operator and/or operator certification.

MDEQ Comment: PWS Program staff maintain two-way interaction with water supply personnel via telephone and e-mail on a regular basis whenever necessary. A PWS that loses a certified operator may notify PWS Program staff by phone, e-mail, or in writing. Otherwise, PWS Program staff will discover a missing operator during phone/e-mail conversations, on-site visits, and during the sanitary survey process.

- f. Clarify that monthly monitoring is required in any month that the system serves more than 1,000 people.

MDEQ Comment: We anticipate using this provision in only the most rare cases of NCWSs, such as at cider mills and festival sites, whose population has huge fluctuations during select events during the year. We will work with these supplies to accurately establish the service population and how they fluctuate. As is our long-standing practice to provide technical assistance to ensure compliance as requirements change, we will clearly state our expectations during on-site meetings, in correspondence, and via phone calls.

- g. Determine whether the primacy agency will allow TNCWSs with monitoring violations to conduct make-up monitoring to qualify for reduced monitoring. Also, describe the timeframe for sampling (i.e., before the end of the quarter or year) and the number of samples a system will need to make-up before sampling again.

MDEQ Comment: The RTCR allows primacy agencies to not count a monitoring violation so a TNCWS may qualify for or remain on quarterly (routine) monitoring. However, the allowance does not apply for a TNCWS to remain on annual (reduced) monitoring. We will exercise the provision as per 40 CFR §141.854(a)(4), i.e., the TNCWS on monthly frequency must collect the make-up sample in the next month and the TNCWS on quarterly monitoring must collect the make-up sample in the next quarter in a different week than the routine sample for that month or quarter, respectively. The make-up is the same number of samples and from the same sites as routine monitoring requirements; in other words, there is no additional samples required just because they are make-up sample(s). A single sample shall not be attributed to more than 1 monitoring period, as required in R 325.10708 of the rules promulgated pursuant to the Michigan Safe Drinking Water Act, 1976 PA 399, as amended.

- h. Conduct annual site visits, Level 2 assessments or sanitary surveys.

MDEQ Comment: Our long-standing practice of system surveillance has included at least annual on-site visits to CWSs. Sanitary surveys are performed by the LHD in NCWSs and district staff in CWSs. The Level 2 assessments will be similar to a sanitary survey.

**State Requirements for Waiving the Three Routine Samples after a TC+ Result for Any PWS on Quarterly or Annual Monitoring**

MDEQ Comment: All CWSs will monitor monthly with no provision to reduce to quarterly. Our draft rules adopt provision to waive three routine samples after a TC+ result.

- a. Determine the criteria for waiving the samples and whether the waiver provision will be utilized.

MDEQ Comment: As we committed in the 1989 TCR primacy application, we will use the criteria outlined in the rule to determine if the waiver is appropriate.

- b. Conduct a site visit before the end of the next month the system serves water to the public, in addition to determining the waiver criteria for this requirement.

**Special Monitoring Evaluation**

- a. Describe special monitoring evaluation procedures. Special monitoring evaluations must be conducted during each sanitary survey at all ground water systems serving 1,000 or fewer people.

MDEQ Comment: As we committed in the 1989 TCR primacy application, we will determine if reduced monitoring is appropriate; if the supply has no total coliform contamination; and if the supply's most recent sanitary survey, conducted as per rule, shows that the water supply source is protected groundwater that meets criteria in our Groundwater Sources Rules R 325.10817 to R 325.10831. The sanitary survey data gathering form is the evaluation tool the PWS Program staff use to determine if criteria are met. Staff of the PWS Program will not reduce monitoring if the supply is out of compliance with drinking water standards or if isolation or construction requirements are not met.

- b. Determine the activities that will take place during each special monitoring evaluation, including reevaluating the appropriateness of the PWS monitoring frequency and number of samples per monitoring period, determining vulnerable or critical timeframes for monitoring and determining whether critical sites are being monitored.

MDEQ Comment: All items listed in *Monitoring Requirements and Primacy Agency Activities*, Item 2, will be evaluated if considering reduced monitoring. Vulnerable or critical time frames are still being discussed. Critical sites currently should not be on annual frequency. When determining whether a source is protected, we may identify critical sites and place criteria for monitoring appropriateness, such as Karst formations.